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February 1, 2021

VIA ECF

Hon. C. Darnell Jones, II, U.S.D.J.
United States District Court for the Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

Re: D. Kress v. Fulton Bank, N.A.
Civil Action No. 1:19-cv-18985-CDJ-JS

Dear Judge Jones:

My firm represents Plaintiff in the above-referenced matter. With Defendant's consent, I write to request an extension of Plaintiff's deadline to file her Motion for Preliminary Approval of Collective and Class Action Settlement from February 1, 2021 to February 11, 2021.

The proposed settlement is complex and resolves a hybrid collective and class action involving employees from several states. The Parties' counsel have continued to confer and have resolved most of their disagreements over the language of the formal settlement agreement and related documents to be filed with Plaintiff's forthcoming motion for preliminary approval. The Parties believe they will be able to resolve the few remaining disputes and finalize the aforementioned documents if the requested extension is provided.

Plaintiff thanks the Court for its time and consideration.

Respectfully Submitted,

SWARTZ SWIDLER LLC

s/Matthew Miller
Matthew D. Miller, Esq.

So Ordered this 3rd day of February 2021

cc: Louisa Johnson, Esq., *counsel for Defendant, via ECF*
Robert Szyba, Esq., *counsel for Defendant, via ECF*

s/ Ann Marie Donio

ANN MARIE DONIO, U.S.M.J.